

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)</b>

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**CERTIFICATION OF C. BRETT VAUGHN IN SUPPORT OF PLAINTIFFS' *DAUBERT*  
MOTION TO PRECLUDE THE DEFENSE EXPERT JASON O. CLEVINGER FROM  
OFFERING CLASS CERTIFICATION OPINIONS**

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**C. BRETT VAUGHN**, hereby certify as follows:

1. I am an attorney at law within the State of Kansas with the Hollis Law Firm, P.A., and serve as a Court-appointed Member of the Plaintiffs' Executive Committee. I am fully familiar with the facts and circumstances of these actions. I make this certification in support of Plaintiffs' motion to exclude the testimony of Jason O. Clevenger.

2. Attached hereto as **Exhibit A** is a true and accurate copy of Sanjay Singh's May 21, 2021 821:15-822:5 excerpts.

3. Attached hereto as **Exhibit B** is a true and accurate copy of APL-MDL-2875-0251669 at 793.

4. Attached hereto as **Exhibit C** is a true and accurate copy of APL-MDL-2875-0048766.

5. Attached hereto as **Exhibit D** is a true and accurate copy of APL-MDL-2875-0102832 at 835, 859-861.

6. Attached hereto as **Exhibit E** is a true and accurate copy of APL-MDL-2875-0135475.

7. Attached hereto as **Exhibit F** is a true and accurate copy of APL-MDL-2875-0076155 at  
173.

Dated: May 3, 2022

Respectfully Submitted,

By: /s/ C. Brett Vaughn  
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